



**Acheson Colloids Company**  
1600 Washington Avenue  
Port Huron, Michigan 48060  
1-810-984-5581  
Fax: 1-810-984-1446

2/6/04

Raymond J. Cullen  
Air Enforcement and Compliance Assurance Branch  
US EPA – Region 5  
77 W. Jackson Blvd. (G-17J)  
Chicago, IL 60604

RE: EPA Clean Air Act Section 114 request

Dear Mr. Cullen,

In response to your request for information concerning the VOC content of architectural coatings manufactured and marketed by Acheson Colloids Company; we have reviewed the request and associated information and have prepared the following response:

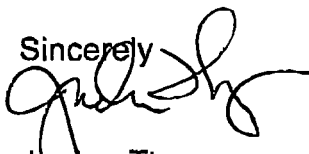
As you point out in your letter, Acheson Colloids manufactures and markets conductive coatings for use in a broad spectrum of specialty applications. We currently manufacture and market Electrodag SP008A as a shielding coating which can be field applied for the suppression and attenuation of EMR (electromagnetic radiation) (e.g. for use in hospitals). Based on our review of the definitions, none of the architectural coating categories specifically identify this type of coating and therefore we believe it is not subject to the VOC limits imposed under §59.400.

Acheson Colloids also manufactures and markets several "antenna" coatings, which is listed as an architectural coating category covered by the regulation. Based on our review of the definitions, our antenna coatings are specifically excluded from the definition of an "architectural" coating. The definition excludes "shop" applied coatings and non-stationary structures. These antenna coatings are marketed and sold to manufacturers who as part of their manufacturing processes will "shop" apply these coatings to parts and or equipment (non-stationary) under controlled conditions (Spray booths w/ curing ovens, etc). As such we have determined that these coatings are not architectural coatings and therefore are not subject to the VOC limits imposed under §59.400.

I hope that this letter satisfies your informational needs. If you have any questions please contact me at (810) 984-5581.

Acheson  
Colloids  
Company

Sincerely



Jordan Thompson  
Safety, Health and Environmental Manager

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsible for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, with the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the act, and 18 USC §§ 1001 and 1341.



2-6-2004

Frank Mastria – Manufacturing Director ~ North America

Date

Cc: Ms. Teresa Seidel – MDEQ; Sue Frasier – Environment Canada;